(4)

No. 03-1496

IN THE

SUPREME COURT OF THE UNITED STATES

Meredith T. Raney, Jr.,

Petitioner,

v.

Allstate Insurance Company, Allstate Floridian Insurance Company, Ocala Women`s Center, Inc., Aware Woman Center For Choice, Inc., Edward W. Windle, Jr., Patricia Baird Windle, James S. Pendergraft,M.D., and Manhattan Magnolia, Corp.,

Respondents.

On Petition For A Writ Of Certiorari
To The United States Court Of Appeals
For The Eleventh Circuit

SELECTED EXHIBITS TO SUPPLEMENTAL BRIEF

Christopher F. Sapp
Counsel of Record
1323 Wilderness Lane
Titusville, Fl 32796
(321) 268-8758

RECEIVED
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OFFICE OF THE CLERK
SUPREME COURT, U.S.

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Portion of the 9/11 Commission Report showing that there is an Iranian connection to the terrorist attacks which has not been completely investigated.

Portion of the 9/11 Commission Report concerning terrorists' funding.

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SUBJECT [A]

THE 9/11 COMMISSION REPORT

FINAL REPORT OF THE NATIONAL COMMISSION ON TERRORIST ATTACKS UPON THE UNITED STATES

AUTHORIZED EDITION

manipulation of the stock market based on its advance knowledge of the 9/11 attacks. Exhaustive investigations by the Securities and Exchange Commission, FBI, and other agencies have uncovered no evidence that anyone with advance knowledge of the attacks profited through securities transactions.[130]

To date, the U.S. government has not been able to determine the origin of the money used for the 9/11 attacks. Ultimately the question is of little practical significance. Al Qaeda had many avenues of funding. If a particular funding source had dried up, al Qaeda could have easily tapped a different source or diverted funds from another project to fund an operation that cost $400,000–$500,000 over nearly two years.

The Funding of the 9/11 Plot

As noted above, the 9/11 plotters spent somewhere between $400,000 and $500,000 to plan and conduct their attack. The available evidence indicates that the 19 operatives were funded by al Qaeda, either through wire transfers or cash provided by KSM, which they carried into the United States or deposited in foreign accounts and accessed from this country. Our investigation has uncovered no credible evidence that any person in the United States gave the hijackers substantial financial assistance. Similarly, we have seen no evidence that any foreign government—or foreign government official—supplied any funding.[131]

We have found no evidence that the Hamburg cell members (Atta, Shehhi, Jarrah, and Binalshibh) received funds from al Qaeda before late 1999. It appears they supported themselves. KSM, Binalshibh, and another plot facilitator, Mustafa al Hawsawi, each received money, in some cases perhaps as much as $10,000, to perform their roles in the plot.[132]

After the Hamburg recruits joined the 9/11 conspiracy, al Qaeda began giving them money. Our knowledge of the funding during this period, before the operatives entered the United States, remains murky. According to KSM, the Hamburg cell members each received $5,000 to pay for their return to Germany from Afghanistan after they had been selected to join the plot, and they received additional funds for travel from Germany to the United States. Financial transactions of the plotters are discussed in more detail in chapter 7.

Requirements for a Successful Attack

As some of the core operatives prepared to leave for the United States, al Qaeda's leaders could have reflected on what they needed to be able to do in order to organize and conduct a complex international terrorist operation to inflict catastrophic harm. We believe such a list of requirements would have included

- leaders able to evaluate, approve, and supervise the planning and direction of the operation;
- communications sufficient to enable planning and direction of the operatives and those who would be helping them;

Moqed, flew into Iran from Bahrain. In February 2001, Khalid al Mihdhar may have taken a flight from Syria to Iran, and then traveled further within Iran to a point near the Afghan border.[125]

KSM and Binalshibh have confirmed that several of the 9/11 hijackers (at least eight, according to Binalshibh) transited Iran on their way to or from Afghanistan, taking advantage of the Iranian practice of not stamping Saudi passports. They deny any other reason for the hijackers' travel to Iran. They also deny any relationship between the hijackers and Hezbollah.[126]

In sum, there is strong evidence that Iran facilitated the transit of al Qaeda members into and out of Afghanistan before 9/11, and that some of these were future 9/11 hijackers. There also is circumstantial evidence that senior Hezbollah operatives were closely tracking the travel of some of these future muscle hijackers into Iran in November 2000. However, we cannot rule out the possibility of a remarkable coincidence—that is, that Hezbollah was actually focusing on some other group of individuals traveling from Saudi Arabia during this same time frame, rather than the future hijackers.[127]

We have found no evidence that Iran or Hezbollah was aware of the planning for what later became the 9/11 attack. At the time of their travel through Iran, the al Qaeda operatives themselves were probably not aware of the specific details of their future operation.

After 9/11, Iran and Hezbollah wished to conceal any past evidence of cooperation with Sunni terrorists associated with al Qaeda. A senior Hezbollah official disclaimed any Hezbollah involvement in 9/11.[128]

We believe this topic requires further investigation by the U.S. government.

7.4 FINAL STRATEGIES AND TACTICS

Final Preparations in the United States

During the early summer of 2001, Atta, assisted by Shehhi, was busy coordinating the arrival of most of the muscle hijackers in southern Florida—picking them up at the airport, finding them places to stay, and helping them settle in the United States.[129]

The majority settled in Florida. Some opened bank accounts, acquired mailboxes, and rented cars. Several also joined local gyms, presumably to stay fit for the operation. Upon first arriving, most stayed in hotels and motels; but by mid-June, they settled in shared apartments relatively close to one another and Atta.[130] Though these muscle hijackers did not travel much after arriving in the United States, two of them, Waleed al Shehri and Satam al Suqami, took unusual trips.

On May 19, Shehri and Suqami flew from Fort Lauderdale to Freeport, the Bahamas, where they had reservations at the Bahamas Princess Resort. The two were turned away by Bahamian officials on arrival, however, because they

Flights of Saudi Nationals Leaving the United States

Three questions have arisen with respect to the departure of Saudi nationals from the United States in the immediate aftermath of 9/11: (1) Did any flights of Saudi nationals take place before national airspace reopened on September 13, 2001? (2) Was there any political intervention to facilitate the departure of Saudi nationals? (3) Did the FBI screen Saudi nationals thoroughly before their departure?

First, we found no evidence that any flights of Saudi nationals, domestic or international, took place before the reopening of national airspace on the morning of September 13, 2001.[24] To the contrary, every flight we have identified occurred after national airspace reopened.[25]

Second, we found no evidence of political intervention. We found no evidence that anyone at the White House above the level of Richard Clarke participated in a decision on the departure of Saudi nationals. The issue came up in one of the many video teleconferences of the interagency group Clarke chaired, and Clarke said he approved of how the FBI was dealing with the matter when it came up for interagency discussion at his level. Clarke told us, "I asked the FBI, Dale Watson . . . to handle that, to check to see if that was all right with them, to see if they wanted access to any of these people, and to get back to me. And if they had no objections, it would be fine with me." Clarke added, "I have no recollection of clearing it with anybody at the White House."[26]

Although White House Chief of Staff Andrew Card remembered someone telling him about the Saudi request shortly after 9/11, he said he had not talked to the Saudis and did not ask anyone to do anything about it. The President and Vice President told us they were not aware of the issue at all until it surfaced much later in the media. None of the officials we interviewed recalled any intervention or direction on this matter from any political appointee.[27]

Third, we believe that the FBI conducted a satisfactory screening of Saudi nationals who left the United States on charter flights.[28] The Saudi government was advised of and agreed to the FBI's requirements that passengers be identified and checked against various databases before the flights departed.[29] The Federal Aviation Administration representative working in the FBI operations center made sure that the

FBI was aware of the flights of Saudi nationals and was able to screen the passengers before they were allowed to depart.[30]

The FBI interviewed all persons of interest on these flights prior to their departures. They concluded that none of the passengers was connected to the 9/11 attacks and have since found no evidence to change that conclusion. Our own independent review of the Saudi nationals involved confirms that no one with known links to terrorism departed on these flights.[31]

10.2 PLANNING FOR WAR

By late in the evening of September 11, the President had addressed the nation on the terrible events of the day. Vice President Cheney described the President's mood as somber.[32] The long day was not yet over. When the larger meeting that included his domestic department heads broke up, President Bush chaired a smaller meeting of top advisers, a group he would later call his "war council."[33] This group usually included Vice President Cheney, Secretary of State Powell, Secretary of Defense Donald Rumsfeld, General Hugh Shelton, Vice Chairman of the Joint Chiefs (later to become chairman) General Myers, DCI Tenet, Attorney General Ashcroft, and FBI Director Robert Mueller. From the White House staff, National Security Advisor Condoleezza Rice and Chief of Staff Card were part of the core group, often joined by their deputies, Stephen Hadley and Joshua Bolten.

In this restricted National Security Council meeting, the President said it was a time for self-defense. The United States would punish not just the perpetrators of the attacks, but also those who harbored them. Secretary Powell said the United States had to make it clear to Pakistan, Afghanistan, and the Arab states that the time to act was now. He said we would need to build a coalition. The President noted that the attacks provided a great opportunity to engage Russia and China. Secretary Rumsfeld urged the President and the principals to think broadly about who might have harbored the attackers, including Iraq, Afghanistan, Libya, Sudan, and Iran. He wondered aloud how much evidence the United States would need in order to deal with these countries, pointing out that major strikes could take up to 60 days to assemble.[34]

President Bush chaired two more meetings of the NSC on September 12. In the first meeting, he stressed that the United States was at war with a new and different kind of enemy. The President tasked principals to go beyond their pre-9/11 work and develop a strategy to eliminate terrorists and punish those who support them. As they worked on defining the goals and objectives of the upcoming campaign, they considered a paper that went beyond al Qaeda to

BEST AVAILABLE COPY

THE BERGER CAPER: WHAT THE 9/11 REPORT SAYS

WHEN IT WAS DISCLOSED that former Clinton National Security Adviser Samuel (Sandy) Berger was being investigated by the FBI for removing classified documents from the National Archives, Democrats cried foul, claiming the news was leaked to distract attention from the imminent release of *The 9/11 Commission Report*. The report managed to move Berger's troubles off the front page, but it contained some passages that could surely make him uncomfortable. It describes several instances in which the Clinton adviser was presented with plans of action to hit al-Qaeda in Afghanistan—and balked. In the margin next to a suggestion from Richard Clarke, Berger's counterterrorism czar, to attack al-Qaeda facilities in late 1999, Berger wrote "No." The report also says Berger nixed at least two plans to go after Osama bin Laden in the three years leading up to the Sept. 11 attacks.

The papers he took don't relate to those incidents, and Berger claims he took them inadvertently. To be sure, it's unlikely he thought he could hide anything from those writing the 9/11 report. Berger's spokesman, Joe Lockhart, pointed out that the Archives gave Berger only photocopies of the original documents—and informed Berger of that—so any cover-up would have been impossible. After learning of the incident, commission chairman Thomas Kean said his staff members checked and were sure they had "every single document that [they] needed or requested."

CHRIS MADDALONI—ROLL CALL/POLARIS

The former National Security Adviser: an "honest mistake"?

So how to explain what Berger called an "honest mistake"? He says that in gathering up papers, he must have accidentally taken some Archives documents along with his notes. Those who have worked with him find that plausible. Berger could get wrapped up in his work, they say, and his desk was piled high with documents and notes. "He always kept a lot of paper," says a former assistant. Nonetheless, Berger has now severed his ties as an informal adviser to the Kerry campaign, and a man once touted as a potential Secretary of State has seen his reputation tarnished. —*By Brian Bennett and Michael Weisskopf*

PATRICK KOVARIK—AFP/GETTY

OF THE WEEK

After five consecutive wins in the Tour de France, [illegible] faced daunting challenges this year, including the tenacity of Italy's Ivan Basso. But on the race's alpine stretch, Armstrong claimed the lead, widened it as the cyclists wound their way back toward Paris, and headed for an unprecedented sixth straight victory in the Tour de France, leaving everyone to marvel at his latest tour de force.

An Interfaith Friendship Frayed

FOR NEARLY HALF A CENTURY, FEW interfaith relationships have been sturdier than that between Jews and the Presbyterian Church (U.S.A.). Forged after the Holocaust and during the civil rights movement, the amity reached a high point in 1987, when a Presbyterian "study document" acknowledged the Jews' ongoing and legitimate covenant with God.

Yet a sense of betrayal is building among Jewish groups over two votes at the Presbyterians' recent General Assembly. The first tally sustained funding for "Messianic Jewish" congregations like Avodat Yisrael, a Philadelphia-area Presbyterian gathering that meets Saturdays and gives every appearance of being a synagogue but features New Testament readings. Most Jews consider such entities, often funded by conservative Christian groups, to be a devious way of luring new converts to Christianity. The second vote initiated the church's "phased selective divestment" from some corporations operating in Israel.

Many Jewish leaders regard the two measures as a double-barreled assault on their faith and the Jewish state. Says interfaith veteran Rabbi James Rudin: "They turn back much of the achievement of the last 40 years." But the resolutions actually reflect two different—and mutually hostile—constituencies. The divestment was backed by the liberal Presbyterian majority, which traditionally tempers its affirmation of Israel's right to exist with concern for Palestinian welfare. The margin for continuing Messianic funding was provided by an increasingly powerful evangelical minority. Some church activists seem honestly taken aback by the two measures being linked in controversy. It is, says conservative leader the Rev. Parker Williamson, "a disjunction, almost like frying ice." But apparently even fried ice can exert a chill. —*By David Van Biema*

Andrew Sparks leads a Philadelphia Messianic group

SUBJECT [B]

IN THE UNITED STATES COURT OF APPEALS

FOR THE ELEVENTH CIRCUIT

FILED
U.S. COURT OF APPEALS
ELEVENTH CIRCUIT
MAY 19 2004
THOMAS K. KAHN
CLERK

03-16383-DD

MEREDITH T. RANEY, JR.,

Plaintiff-Appellant,

versus

ALLSTATE INSURANCE COMPANY,
ALLSTATE FLORIDIAN INSURANCE COMPANY,
OCALA WOMEN'S CENTER, INC.,
AWARE WOMAN CENTER FOR CHOICE, INC.,
EDWARD W. WINDLE, JR., et al.,

Defendants-Appellees.

On Appeal from the United States District Court for the
Middle District of Florida

BEFORE: CARNES, BARKETT, and HULL, Circuit Judges.

BY THE COURT:

The motion by Appellees Allstate Insurance Company and Allstate Floridian Insurance Company (collectively "Allstate") to strike Appellant's reply brief is GRANTED.

Allstate's motions for sanctions against Appellant for filing the reply brief is GRANTED to the extent of admonishing counsel for Appellant to refrain from making allegations which are unsupported by the record and which could be construed as accusations of criminal misconduct.

Appellant's motion to strike Allstate's motion to strike, included in Appellant's response to Allstate's motion, is DENIED.

THE FLORIDA BAR

1200 EDGEWATER DRIVE
ORLANDO, FL 32804-6314

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

LAWYER REGULATION DEPARTMENT 407/425-5424
UPL DEPARTMENT 407/425-0473
WWW.FLABAR.ORG

June 9, 2004

Christopher Francis Sapp
1323 Wilderness Ln
Titusville, FL 32796-4217

RE: Inquiry by The Florida Bar
Case No. 2004-31,915(09E)

Dear Mr. Sapp:

Enclosed, please find copies of the United States Court of Appeals', Eleventh Circuit, order, Appellee's motion to strike, and Appellant's reply brief, filed in Appeal No. 03-16383-DD, Raney v. Allstate Insurance Company, et al., the subject of which has given rise to an investigation as to possible attorney misconduct. As a result thereof, the above-referenced file was opened where The Florida Bar is the complainant.

Specifically, you represent plaintiff-appellant Meredith Raney in an appeal of the dismissal of Mr. Raney's RICO complaint. On April 5, 2004, the appellees moved to strike appellant's March 14, 2004 reply brief and requested that appellant be sanctioned. The appellees asserted, in sum and substance, that appellant's brief included "scandalous and fictitious assertions" that were unsupported by the record. Further, the appellees asserted, in sum and substance, that you made unsubstantiated disparaging comments about Circuit Court Judge Vincent G. Torpy, Jr., Eighteenth Judicial Circuit, engaging in a conspiracy with the appellees and others. Despite the assertions contained in your response, dated April 14, 2004, by order dated May 19, 2004, the Court issued an order granting the appellees' motion to strike and their motion for sanctions "to the extent of admonishing counsel for Appellant to refrain from making allegations which are unsupported by the record and which could be construed as accusations of criminal misconduct."

Please respond directly to me in writing within fifteen (15) days of receipt of this letter and present your position. You are obligated to provide the undersigned with a written response pursuant to R. Regulating Fla. Bar 4-8.4(g), and you are required to disclose to the partners and shareholders of your firm the existence and nature of this inquiry. Please fill out and return the enclosed disclosure form, using the above case number on all correspondence to this office.

Further, within fifteen days from the date of this letter, please contact the undersigned by telephone at 407-425-5424 to schedule an appointment to meet with the undersigned at the offices of The Florida Bar, located in Orlando, Florida.

Sincerely,

Kenneth H. P. Bryk
Bar Counsel

KHPB/kb

Enclosure

CHRISTOPHER F. SAPP
Attorney At Law
1323 Wilderness Lane
Titusville, Florida 32796
(321) 268-8758
June 25, 2004

Kenneth H. P. Bryk
Bar Counsel
The Florida Bar
1200 Edgewater Drive
Orlando, Florida 32804-6314

Re: Our Case, *Raney v. Allstate, et al.*
United States Supreme Court, No.: 03-1496
Your inquiry, Case No.: 2004-31,915(09E)

Dear Mr. Bryk,

Your letter of June 9, 2004 is particularly disturbing as it appears to be part of a growing body of evidence that anyone disfavored by the abortion industry cannot receive a fair trial or appeal in the United States Eleventh Circuit. More specifically, the pending petition for review by the United States Supreme Court of the federal racketeering case against two Allstate companies and several members of the abortion industry should include consideration not only deficiencies within the federal trial and appellate courts but their misuse of powers and influence with organizations such as the Florida Bar.

The Eleventh Circuit received an unsigned "motion" from Allstate seeking to strike the appellants' reply brief in the *Raney* appeal of an adverse trial decision in the present RICO case. While Allstate, through its attorneys, should have corrected this failure, they did not do so. The clerk of the Eleventh Circuit should never have filed the "motion".

The particular assertions which were contested dealt with Judge Vince Torpy's role in the predicate lawsuit filed by Allstate against Mr. Raney in Brevard County, Florida. That lawsuit was a matter of judicial notice in the resulting RICO action. The papers and pleadings in the predicate Brevard County action support directly or

by reasonable inference all of my statements concerning Judge Vince Torpy.

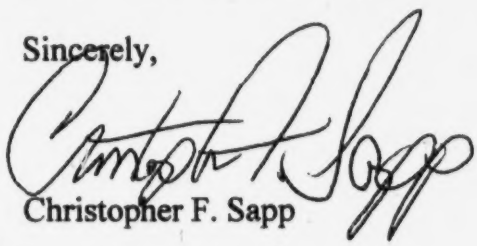
Additionally, after I moved to strike the Allstate "motion", not one single appellee contested my motion. Apparently, it was clear to everyone concerned that Allstate's paper was a sham and was untrue.

Your assertion that the "motion" was filed by "the appellees" is incorrect. It was submitted by Allstate but was never adopted by the other five appellees.

Given that two of the judges at the Eleventh Circuit who participated in the order to strike the reply brief had been previously requested to disqualify themselves from this case and had refused to do so, the decision to strike the reply brief was consistent. Consistent with the serious corruption which, I believe, exists within the Eleventh Circuit.

I will ask the United States Supreme Court to include the Florida Bar's inquiry as part of the case review sought under Rule 11 in the above-referenced petition to that Court. Copies will also be sent to the United States Department of Justice.

Sincerely,



Christopher F. Sapp

CFS/js
sent by U.S. Mail Express Service

CHRISTOPHER F. SAPP
Attorney At Law
1323 Wilderness Lane
Titusville, Florida 32796
(321) 268-8758
June 28, 2004

Honorable John Ashcroft
Attorney General of the United States
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Re: United States Court of Appeal,
Eleventh Circuit

Dear Attorney General Ashcroft,

Judges at the United States Court of Appeal for the Eleventh Circuit appear to be improperly hindering my efforts to have the United States Supreme Court review a controversial situation involving that appellate court.

Copies of recent correspondence with The Florida Bar are enclosed. Considerably more information is available.

Will you please forward this information to the appropriate bureau or agency for investigation and appropriate action? Thank you.

Please let me know if I can help in any way.

Respectfully,

Christopher F. Sapp

CFS/js
enclosures

CHRISTOPHER F. SAPP
Attorney At Law
1323 Wilderness Lane
Titusville, Florida 32796
(321) 268-8758
June 25, 2004

Kenneth H. P. Bryk
Bar Counsel
The Florida Bar
1200 Edgewater Drive
Orlando, Florida 32804-6314

Re: Our Case, *Raney v. Allstate, et al.*
United States Supreme Court, No.: 03-1496
Your inquiry, Case No.: 2004-31,915(09E)

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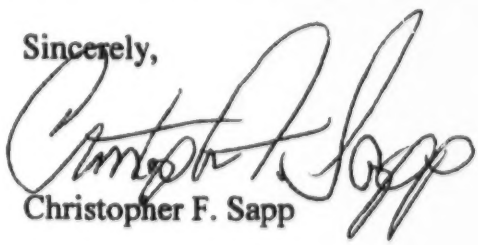

Christopher F. Sapp

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sent by U.S. Mail Express Service

THE FLORIDA BAR

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JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

LAWYER REGULATION DEPARTMENT 407/425-5424
UPL DEPARTMENT 407/425-0473
WWW.FLABAR.ORG

June 9, 2004

Christopher Francis Sapp
1323 Wilderness Ln
Titusville, FL 32796-4217

RE: Inquiry by The Florida Bar
Case No. 2004-31,915(09E)

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Specifically, you represent plaintiff-appellant Meredith Raney in an appeal of the dismissal of Mr. Raney's RICO complaint. On April 5, 2004, the appellees moved to strike appellant's March 14, 2004 reply brief and requested that appellant be sanctioned. The appellees asserted, in sum and substance, that appellant's brief included "scandalous and fictitious assertions" that were unsupported by the record. Further, the appellees asserted, in sum and substance, that you made unsubstantiated disparaging comments about Circuit Court Judge Vincent G. Torpy, Jr., Eighteenth Judicial Circuit, engaging in a conspiracy with the appellees and others. Despite the assertions contained in your response, dated April 14, 2004, by order dated May 19, 2004, the Court issued an order granting the appellees' motion to strike and their motion for sanctions "to the extent of admonishing counsel for Appellant to refrain from making allegations which are unsupported by the record and which could be construed as accusations of criminal misconduct."

Please respond directly to me in writing within fifteen (15) days of receipt of this letter and present your position. You are obligated to provide the undersigned with a written response pursuant to R. Regulating Fla. Bar 4-8.4(g), and you are required to disclose to the partners and shareholders of your firm the existence and nature of this inquiry. Please fill out and return the enclosed disclosure form, using the above case number on all correspondence to this office.

Further, within fifteen days from the date of this letter, please contact the undersigned by telephone at 407-425-5424 to schedule an appointment to meet with the undersigned at the offices of The Florida Bar, located in Orlando, Florida.

Sincerely,

Kenneth H. P. Bryk
Bar Counsel

KHPB/kb

Enclosure

THE FLORIDA BAR

1200 EDGEWATER DRIVE
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JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

LAWYER REGULATION DEPARTMENT 407/425-5424
UPL DEPARTMENT 407/425-0473
www.FLABAR.org

July 1, 2004

Michael L. Irwin, Chair
Grievance Committee 9E
545 Delaney Ave Bldg 5
Orlando, FL 32801

RE: Complaint by The Florida Bar
Against Christopher Francis Sapp
Case No. 2004-31,915(09E)

Dear Mr. Irwin:

This is to advise that the above-referenced matter has been forwarded to your committee for further investigation and disposition.

The matter is now pending at grievance committee.

Sincerely,

Kenneth H. P. Bryk
Bar Counsel

KHPB/kb

Enclosure

cc: Christopher Francis Sapp - w/o enclosure
1323 Wilderness Ln
Titusville, FL 32796-4217

IN THE SUPREME COURT OF FLORIDA
(Before a Grievance Committee)

THE FLORIDA BAR,

Complainant,

vs.

CHRISTOPHER FRANCIS SAPP,

Respondent.
_____/

TFB Case No. 2004-31,915(09E)

NOTICE OF ASSIGNMENT OF INVESTIGATING MEMBER AND/OR PANEL

To Complainant:
The Florida Bar

To Respondent:
Christopher Francis Sapp
1323 Wilderness Ln
Titusville, FL 32796-4217

Tele: 321/268-8758

Receipt of a complaint on May 27, 2004, against respondent is acknowledged. The complaint has been given the above case number and is hereby assigned to the following member of the committee for investigation:

Scott A. Cookson
8403 South Park Circle
Orlando, FL 32801
Telephone: 321-354-2500

Notice is given that this case will be considered by the committee.

Respondent and complainant shall contact the investigating member within ten (10) days from the date of this notice to discuss the investigation and disposition of this complaint.

DATED this 1st day of July, 2004.

Kenneth H. P. Bryk
Bar Counsel

Copies furnished to:
1. Michael L. Irwin, Chair
2. Designated Reviewer for the committee
3. Scott A. Cookson, Investigating member (with file)
4. Respondent
5. Complainant

CHRISTOPHER F. SAPP
Attorney At Law
1323 Wilderness Lane
Titusville, Florida 32796
(321) 268-8758
July 7, 2004

Scott A. Cookson
8403 South Park Circle
Orlando, Florida 32801

Re: Our Case, *Raney v. Allstate, et al*
United States Supreme Court, No.: 03-1496
Your inquiry, Case No.: 2004-31,915 (09E)

Dear Mr. Cookson,

Please send me copies of all papers and or items in The Florida Bar file referenced above. Also, please furnish me with recaps of any conversations you have had concerning this matter.

Thank you for your prompt attention to my request.

Sincerely,

Christopher F. Sapp

CFS/js

CHRISTOPHER F. SAPP
Attorney At Law
1323 Wilderness Lane
Titusville, Florida 32796
(321) 268-8758
August 3, 2004

Scott A. Cookson
8403 South Park Circle
Orlando, Florida 32801

Re: Our Case: *Raney v. Allstate, et al*
United States Supreme Court, No.: 03-1496
Your inquiry, Case No.: 2004-31,915 (09E)

Dear Mr. Cookson,

A copy of my letter to you dated July 7, 2004 is attached for your reference.

Please immediately furnish me all of the items requested in the July 7 letter.

Thank you.

Sincerely,

Christopher F. Sapp

CFS/js
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SUBJECT [C]

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
NO. 98-5-CV-ORL-19C

AWARE WOMAN CENTER FOR CHOICE, INC,
a Florida corporation,
on its own behalf and for the class of patients,
patient companions, staff, physicians,
invitees, owners, and independent contractors,

PATRICIA BAIRD WINDLE,
EDWARD W WINDLE, JR,
TIFFANY POE, DON POE, GRANDFATHER POE,
and the classes of
JANE POE I-M (1-1000), and JOHN POE I-M,

Plaintiffs,

-versus-

MEREDITH T RANEY, JR,
individually and holding himself out as
WOMEN'S LEGAL ACTION COALITION, and
CHRISTIANS FOR LIFE,
unincorporated associations,
participating in concert with one another,

WILLIAM LESTOURGEON,
ALLEN LESTOOURGEON,
JOHN C 'JAY' ROGERS,
MARK STEVEN HALL,
PATRICIA McEWEN,

CHERYL PALMER,
CHRISTINE JAGOS,
DOLLY EDWARDS,
ALLEN MUNROE,
NORMA MUNROE,

INJUNCTIVE RELIEF SOUGHT
JURY TRIAL REQUESTED ON DAMAGES
CLASS ACTION RELIEF

RICHARD DEAN,
CECELIA STANBACK,
PAT PINKSTON,
NANCY LALLY,
LUTHER LAITE,
ANNE BLACKBURN,

NIGHTSTALKER DOE,
JANE DOEs and JOHN DOEs I-XX,

COMPUSERVE, INCORPORATED,
a corporation doing business in Florida,

AMERICA ONLINE, INC,
a corporation doing business in Florida,
and parent successor to COMPUSERVE, INC,

TML INFORMATION SERVICES, INC,
a corporation doing business in Florida,

DOE CORPORATIONS I-XX,
their agents, assigns, successors in interest,
those acting in concert or participating with them,
all those having actual or constructive
notice of any injunctive orders issued herein,
and the class of individuals and entities similarly
situated as to the named defendants,

Defendants.

COMPLAINT OF AWCC *et al:* CIVIL CLASS ACTION
FOR DAMAGES, DECLARATORY & INJUNCTIVE RELIEF
UNDER F.A.C.E., 18 USC §248, FDPPA, 18 USC §2721,
AND SUPPLEMENTAL FEDERAL & STATE LAW GROUNDS
INJUNCTIVE RELIEF SOUGHT
JURY TRIAL REQUESTED ON DAMAGES
CLASS ACTION RELIEF SOUGHT

NOTICE AND SERVICE

(20) An order providing that each and every provision of the injunction shall bind any and all persons having actual or constructive notice thereof, and that notice shall be provided by an appropriate sign in the vicinity, and proof of notice may be made by delivery of said injunction in writing or verbally to any person appearing in the vicinity to be at risk of a violation of any kind., said person to be notified and allowed to cease and desist prior to arrest.

DAMAGES, FORFEITURE, WORK

196. AWCC, each plaintiff, and each class member further respectfully urge the Court to award:

(1) appropriate actual, statutory, and exemplary damages as proven on each applicable count against each and every defendant, jointly and severally as well as reasonable costs, interest, expert witness fees, counsel fees and all other reasonable and necessary litigation expenses.

(2) forfeiture of sufficient and relevant assets of real and personal property of the defendants used in their unlawful and tortious activities.

(3) appropriate work orders requiring certain individual defendants to engage in lawful employment pursuits to pay off and satisfy these damages and judgment debts.

(4) orders setting aside real and personal property transfers made by defendants to avoid responsibility for the unlawful and tortious misconduct involved herein, and

(5) such other relief as shall be necessary and appropriate.

RESPECTFULLY SUBMITTED:

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ATTORNEYS FOR AWCC *ET AL* PLAINTIFFS.

{Service to be effectuated}

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
NORTHERN DIVISION

NO. 99-8164

CIV - HURLEY

MANHATTAN MAGNOLIA CORP.,
a Florida corporation, t/a
AWARE WOMAN MEDICAL CENTER;

MAGISTRATE JUDGE

AWARE WOMAN CENTER FOR CHOICE, INC.,
a Florida corporation;

MAGISTRATE JUDGE
LYNCH

EDWARD W. (TODD) WINDLE, III, WENDY LaVIGNA,
ELLEN MORITZ, CHERYL PFAU, and
SHARON BRANIN,

individually, and on behalf of the classes
of patients, staff, physicians, invitees, guests,
and independent contractors
damaged by defendants,

Plaintiffs,

-versus-

CLASS RELIEF SOUGHT

TRIAL BY JURY REQUESTED

RAYMOND UNTERBURGER,
ERIC OLSON,
CHERYL UNTERBURGER,
MEREDITH TROTTER RANEY, JR,
WILLIAM LeSTOURGEON,

JOHN C 'JAY' ROGERS,
PATRICIA McEWEN,
RICHARD VANDERBILT,
PATRICIA VANDERBILT,
MICHELLE HERZOG, and

JOHN & JANE DOES & MOES I-X,

COMPUSERVE, INCORPORATED,
a corporation doing business in Florida,

TML INFORMATION SERVICES, INC,
a corporation doing business in Florida, and

DOE CORPORATIONS I-X,
their agents, assigns, collaborators, accomplices, confederates, aiders & abettors, successors in interest, those acting in concert or participating with them, and the class of individuals and entities similarly situated as to the named defendants,

Defendants.

COMPLAINT IN CIVIL ACTION FOR DECLARATORY JUDGMENT, STATUTORY & ACTUAL DAMAGES, ASSET FORFEITURE, AND EXEMPLARY DAMAGES, UNDER FACE, 18 USC §248, RICO, 18 USC §1961-1968, AND SUPPLEMENTAL FEDERAL & STATE LAW GROUNDS, AND OTHER NECESSARY AND PROPER RELIEF

Plaintiffs Manhattan Magnolia Corp., *et al* ["MAGNOLIA" may hereafter designate all plaintiffs and classes for brevity], bring this civil action for declaratory relief, statutory and actual personal, property, and business damages, exemplary damages, physical and emotional damage and suffering, forfeiture of assets, vehicles, buildings & things used in defendants' crimes and torts, costs and fees, and other necessary & appropriate relief & compensation, and respectfully state their complaint as follows:

115. Magnolia & AWCC associates and threatened individuals who drive in and out of the Magnolia parking areas are irreparably injured and damaged by the foregoing acts and omissions. None of these individuals has an adequate opportunity, means, or notice to prevent release and unlawful use of this information against them, nor to stop the compilation and reckless use of a "blackmail database" by Raney, LeStourgeon, and their confederates against them.

116. The public interest favors protection of private personal information from potential stalkers and abusers, over the practice by State DMVs and computer database entities of profiting from the unrestrained sale of such information to individuals such as Raney and his confederates.

COUNT X: CIVIL RICO VIOLATIONS

117. Defendants and each one of them with sufficient predicate acts are jointly and severally responsible and liable under RICO for damages caused by their engaging in an unlawful conspiracy, and consorting with one or more unlawful enterprises against plaintiffs, and are thereby subject to penalties of treble damages and asset forfeiture.

COUNT XI: EXEMPLARY DAMAGES, FORFEITURE, WORK

118. Certain reckless misconduct and omissions by defendants have been sufficiently reckless, wanton,

outrageous, inhumane, and malicious to warrant substantial exemplary damages awards against each and every defendant on behalf of each and every plaintiff and class member.

119. Said exemplary damage awards should be made sufficient to deter each defendant forever, and punish and prevent each said defendant from continuing the misconduct at issue, directly or indirectly, in any form, long into the future.

120. Defendants such as Raney, LeStourgeon, and Rogers, who have worked primarily at harassing women and terrorizing health care facilities for these many years, should have their harassment-related assets, property and buildings forfeited, and be ordered to work using any real world skills they may have to satisfy the foregoing requested judgments, and to break loose from their cult-like patterns of unlawful, tortious, delusional, and irrational law-breaking behavior.

VII. TRIAL BY JURY REQUESTED

121. Plaintiffs request trial by jury on each issue of fact and damages as would be required under the common law and the usual practice of this Court.

VIII. JUDGMENT AND RELIEF REQUESTED

WHEREFORE, PLAINTIFFS RESPECTFULLY REQUEST THE

COURT

(1) to enter judgment against each defendant, jointly and severally, for full actual, statutory, punitive, and treble damages, in excess of $50 million, or as proven,

(2) to forfeit sufficient and relevant assets and real & personal property of the defendants that has been used in or facilitated their unlawful activities,

(3) to award pre- and post-judgment interest on appropriate items of damages and costs,

(4) to enter appropriate work orders requiring certain individual defendants to engage in lawful employment pursuits to pay off these damages and judgment debts,

(5) to set aside property transfers made by defendants in recent years which were undertaken specifically to avoid responsibility for unlawful conduct such as involved here,

(6) to award reasonable costs, expenses, expert witness fees & expenses, and attorneys' fees and expenses, as well as any other relief that appears to be necessary and appropriate.

RESPECTFULLY SUBMITTED:

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UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

NO. 98-371-CV-OC-Judge Hodges

JAX

OCALA WOMEN'S CENTER, INC.,
a Florida corporation, and
JAMES S. PENDERGRAFT, M.D.,
on their own behalves and for the class of
patients, staff, and associated physicians,

Plaintiffs,

-versus-

INJUNCTION REQUESTED

CLASS ACTION RELIEF

JURY REQUESTED

CITY OF OCALA, FLORIDA,
MORREY DEEN, Chief of Police,
COUNTY OF MARION, FLORIDA,

HORACE "ED" DEAN, Sheriff,
KEN ERGLE, former Sheriff,

A410

EDWARD JAMES MARTIN SR aka "ED MARTIN,"
MEREDITH TROTTER RANEY, JR,
All individuals acting in concert, and or participating with,
any named Defendant, and all individuals having actual or
constructive notice of any injunctive order from this Court,

and JOHN and JANE DOES I-X, individuals and all other forms
& entities of defendants not yet known by name, participating
with any other named or unnamed defendant,

Defendants.

COMPLAINT IN CIVIL ACTION FOR DECLARATORY JUDGMENT,
INJUNCTIONS, ACTUAL-STATUTORY-EXEMPLARY DAMAGES,
FORFEITURE OF PROPERTY USED,
AND OTHER NECESSARY & APPROPRIATE RELIEF

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(17) Such other preliminary and permanent injunctive relief as shall appear necessary and appropriate.

FORFEITURE OF ASSETS

(18) An order forfeiting to plaintiffs any and all personal and real property and assets used by any defendant directly or indirectly in furtherance of any tortious event adversely affecting any plaintiff or member of plaintiffs' classes.

(19) An order voiding any and all transfers of assets, real and or personal property, made by any defendant since the passage of FACE in 1994, and designed to conceal or avoid responsibility for damages caused by any of the activities complained of in this civil action, and further forfeiting said property to plaintiffs.

WORK ORDERS

(20) Orders directing defendants into real work programs to pay off any and all judgments, and to divert them from further tortious and criminal violations.

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NOTICE AND SERVICE

(21) An order providing that each and every provision of the injunction shall bind any and all persons having actual or constructive notice thereof, and that notice shall be provided by appropriate signs and warnings in the OWC vicinity, and proof of notice may be made by delivery of said injunction in writing or verbally to any person appearing in the vicinity to be at risk of a

violation of any kind.

DAMAGES, COSTS & FEES

(22) All reasonable actual, statutory, and exemplary damages proven by a preponderance of the evidence at trial.

(23) An order awarding reasonable costs, interest, expert witness fees, counsel fees, reasonable and necessary litigation costs & expenses, and such other appropriate relief as may be proved to be necessary or proper at trial and upon other hearings and submissions.

RESPECTFULLY SUBMITTED:

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ATTORNEYS FOR OWC ET AL PLAINTIFFS.